



at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York 10007, at a time and date to be determined by the Court, for entry of the Parties' agreed-upon Proposed Order Preliminarily Approving Settlement and Providing for Notice (the "Preliminary Approval Order"), attached hereto as Exhibit A. If entered, the Preliminary Approval Order will, among other things:

- (1) Preliminarily approve the proposed class action settlement for \$28,000,000.00, subject to notice to the Settlement Class and later consideration of final approval to resolve this Action in its entirety;
- (2) Approve the form, content and manner of the class notices being given to members of the Settlement Class;
- (3) Certify the Settlement Class for purpose of the Settlement; and
- (4) Schedule a hearing, and certain deadlines related thereto, on final approval of the Settlement, proposed Plan of Allocation, and Lead Counsel's application for an award of Attorneys' Fees and reimbursement of Litigation Expenses.

Defendants have informed Lead Plaintiffs that they consent to this motion. Lead Plaintiffs respectfully suggest that this motion may be granted without a hearing such that notice of the proposed Settlement may be promptly sent to the members of the Settlement Class, and that a hearing be scheduled for consideration of final approval of the proposed Settlement.

Dated: July 28, 2017  
New York, New York

Respectfully submitted,

/s/ Steven B. Singer

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